

PRIVACY IMPACT ASSESSMENT

Office of Environmental Information

System Name: EPA Telework Program (new name for EPA's former Flexiplace Program)		
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Reason for Submittal: New PIA <input type="checkbox"/> Revised PIA <input type="checkbox"/> Annual Review <input type="checkbox"/>		
This project is in the following life cycle stage(s):		
Definition <input type="checkbox"/>	Development/Acquisition <input type="checkbox"/>	Implementation <input checked="" type="checkbox"/>
Operation & Maintenance <input type="checkbox"/>	Termination/Decommissioned <input type="checkbox"/>	
<p>Note: Existing Systems require an updated PIA when there is a significant modification or where changes have been made to the system that may create a new privacy risk. For a listing of significant modifications, see OMB Circular A-130, Appendix 1, Section (c) (1) (a-f) at http://www.whitehouse.gov/omb/circulars/a130/a130appendix_i.aspx</p>		

I. Data in the System

1. Describe what data/information will be collected/contained in the system?

The data collected and contained in the system will be forms used by employees who participate in the EPA Telework Program. The forms are: EPA Telework Program Agreement, Telework Termination/Withdrawal, and Recertification Safety Checklist. This is a paper-based system. All data/information (forms) for Telework are securely maintained by the Regional/Program Office Telework Coordinators.

2. What are the sources and types of the data/information in the system?

The types of data/information include employee name, residence, and telephone number. For Medical Telework the data will be any and all medical documentation. The information comes from employees who apply to telework (which is voluntary).

3. How will the information be used by the Agency?

The information will be used to document and manage the EPA Telework Program and to prepare aggregate reports from the Agency, OPM, and for Congressional inquiry.

4. Why is the information being collected? (Purpose)

The information is being collected to effectively manage the EPA Telework Program equitably and legally; to ensure that all teleworking employees have completed the required paperwork and have received the required authorizations to telework.

II. Access Controls for the Data

1. **Who will have access to the data/information in the system (internal and external parties)? If contractors, are the Federal Acquisition Regulations (FAR) clauses included in the contract (24.104 Contract clauses; 52.224-1 Privacy Act Notification; and 52.224-2 Privacy Act)?**

No external parties will have access to this data. The internal parties who will control this data are the Region/Program Office Telework Coordinators.

2. **How have you educated those having authorized access about the misuse of PII data?**

The Regional/Program Office Telework Coordinators will be the same individuals who managed this data under the former Flexiplace Program. They are aware of the need for protecting PII.

3. **Do other systems share or have access to data/information in this system? If yes, explain who will be responsible for protecting the privacy rights of the individuals affected by the interface? (i.e., System Administrators, System Developers, System Managers)**

No. Since this is a paper-based system, there are no other systems that will have access to or share the data. There is no reason for the Telework Coordinators to share information they maintain on employees under their auspices.

4. **Will other agencies, state or local governments share or have access to data/information in this system (includes any entity external to EPA.)? If so, what type of agreement was issued? (i.e., /SA, MOU, etc.)**

No. Aggregate information from this data may be used to respond to OPM requests or Congressional inquiries.

5. **Is the data and /or processes being consolidated? If so, are the proper controls in place to protect the data from unauthorized access or use?**

No. The system is not being consolidated.

III. Attributes of the Data

1. **Explain how the use of the data is both relevant and necessary to the purpose for which the system is being designed.**

The use of the data is relevant because it will ensure that all teleworking employees have completed the required paperwork and have received the required authorizations to telework.

2. **How is the system designed to retrieve information by the user? Will it be retrieved by personal identifier more than 50% of the time? If yes, explain. (A personal identifier is a**

name, Social Security Number, or other identifying symbol assigned to an individual, i.e. any identifier unique to an individual.)

Data will be retrieved primarily by an individual's name.

3. **Do individuals have the opportunity to decline to provide information or to consent to particular uses of the requested information? If yes, how is notice given to the individual? (Privacy policies must clearly explain where the collection or sharing of certain information may be optional and provide users a mechanism to assert any preference to withhold information or prohibit secondary use.)**

If individuals do not completely fill out the Telework Agreement and related forms, their request to telework will not be approved. A statement of this fact is on the Telework Agreement form.

4. **Where is the Web privacy policy stated?**

There is no electronic data collected in this system, so there is no privacy policy. However, there are privacy statements on the forms themselves.

IV. Maintenance and Administrative Controls

1. **Has a record control schedule been issued for the records in the system? If so, provide the schedule number. (You may check with the record liaison officer (RLO) for your AA-ship or Tammy Boulware (Headquarters Records Officer) to determine if there is a retention schedule for the subject records.)**

Yes. EPA Records Schedule 039 (August 15, 2006).

2. **While the data are retained in the system, what are the requirements for determining if the data are still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?**

Individuals are required to have their Telework Agreements re-certified on at least an annual basis. Also, when changes in the employee's alternate work location (AWL) occur, employees must notify their supervisors and Telework Coordinators so that their files can be updated.

3. **Will this system provide the capability to identify, locate, or monitor individuals? If yes, explain.**

Yes. The Region/Program Office Telework Coordinator will be able to retrieve location information on individuals by pulling their paper files.

4. **Does the system use any persistent tracking technologies?**

No. The "system" is not electronic.

5. **Under which System of Records (SOR) notice does the system operate? Provide the name of the stem and its SOR number if applicable. A list of Agency SORs are posted at <http://www.epa.gov/privacy/notice/>. (A SOR is any collection of records under the control of the Agency in which the data is retrieved by a personal identifier.)**

EPA-61, Telework